

# EXHIBIT 14

UNITED STATES DISTRICT COURT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA

LOCAL UNION NO. 98	:	
INTERNATIONAL BROTHERHOOD OF	:	
ELECTRICAL WORKERS, et al.	:	Civil Action No. 11-4579
	:	
Plaintiffs	:	
v	:	
	:	
RGB SERVICES, LLC, et al.	:	
	:	
Defendants	:	
	:	

**AFFIDAVIT OF DEBRA GERBER IN SUPPORT OF PLAINTIFFS'  
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT PURSUANT TO RULE 56 OF THE FEDERAL RULES CIVIL  
PROCEDURE**

I, Debra Gerber, of full age, being first duly sworn according to law upon her oath does say  
and depose:

1. Frank M. Vaccaro & Associates, Inc. is a corporation for profit which provides employee benefit plan administrative and consulting services to the Local Union No. 98, International Brotherhood of Electrical Workers' multi-employee benefit funds.
2. I am an employee of Frank M. Vaccaro & Associates, Inc.
3. The duties and responsibilities associated with my employment with Frank M. Vaccaro & Associates, Inc. require that I maintain an accounting of the values of monthly contributions and withholdings which RGB Services, LLC is required to remit to the Local Union No. 98, International Brotherhood of Electrical Workers pursuant to the Sound and Communication Commercial Voice-Data-Video Agreement, Supplements, Addendums, and Appendices on behalf of the aforementioned multi-employee benefit funds.
4. I have knowledge and information formed after reasonable investigation RGB

Services, LLC's has failed to remit contributions and withholdings due the multi-employer benefit funds for the benefit years 2006, 2007 and 2008 the multi-employer benefit funds consistent with the results of a payroll compliance review performed by the accounting firm Novak/Francella.

5. I have knowledge and information formed after reasonable investigation that as a result of RGB Services, LLC's failure to remit contributions due the multi-employer benefit funds for the benefit years 2006, 2007 and 2008 the multi-employer benefit funds have been deprived of contributions.

6. I have knowledge and information formed after reasonable investigation that as a result of RGB Services, LLC's failure to remit contributions due the multi-employer benefit funds for the benefit years 2006, 2007 and 2008, penalty has been assessed against the RGB Services, LLC pursuant to the controlling provisions of the Commercial Agreement and Trust Agreements.

7. I have knowledge and information formed after reasonable investigation that as a result of RGB Services, LLC's failure to remit contributions due the multi-employer benefit funds for the benefit years 2006, 2007 and 2008, interest has been assessed against the RGB Services, LLC pursuant to the controlling provisions of the Commercial Agreement and Trust Agreements.

8. I have knowledge and information formed after reasonable investigation that as a result of RGB Services, LLC's failure to remit contributions due the multi-employer benefit funds for the benefit years 2006, 2007 and 2008, the multi-employer benefit funds have been caused to retained counsel to advance a prosecution and have incurred costs and reasonable attorney's fees associated with prosecuting this matter.

9. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willingly false, I am subject to punishment.

Dated:

8/1/12

By:

  
Debra Gerber